

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE
COMMISSION

Mailing Online Service)

Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS: DANIEL STIREWALT
(OCA/USPS-T3-5-6)
(July 31, 1998)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-7 to witness Lee Garvey, dated July 21, 1998, are hereby incorporated by reference.

Respectfully submitted,

Gail Willette

Gail Willette
Acting Director
Office of the Consumer Advocate

Emmett Rand Costich

Emmett Rand Costich
Acting Assistant Director



OCA/USPS-T3-5. Please refer to USPS-LR-1/MC98-1, page 3. The following statement appears under the heading "Methodology":

A cost figure was assigned to each cost component based on the results reported in Attachment 1. *Attachment 2: Detailed Cost Estimates* documents all cost elements and the costs assigned to each.

- a. Please define the expression "cost figure" as used here.
- b. Please define the expression "cost component" as used here.
- c. Please define the expression "cost elements" as used here.
- d. Please define the expression "based on" as used here.
- e. For each number in *Attachment 2: Detailed Cost Estimates* that is "based on the results reported in Attachment 1," show the derivation of the number and its relationship to "the results reported in Attachment 1."

OCA/USPS-T3-6. Please refer to USPS-LR-1/MC98-1, page 3. The following statement appears under the heading "Assumptions":

There are 1500 miles mean distance from the Postal Service Mailing Online processing site to any given print site. Ten sites will perform printing for Mailing Online in 1999, with projections of 17 sites by 2000, and 25 sites in following years.

- a. Please define "mean distance" as used here.
- b. Please show how the 1500 miles is calculated.
- c. Does "distance" refer to air miles, road miles, wire miles, or some other concept. Please explain.
- d. Please identify all cells in the spreadsheets for Attachments 1 and 2 where the 1500 miles is used.

- e. What is the "mean distance from the Postal Service Mailing Online processing site to" printing sites during (i) the operations test period, (ii) the market test period, (iii) the experiment period, (iv) 1999, (v) 2000, (vi) "the following years"? Please show how each of these distances is calculated.
- f. Does any other Postal Service witness utilize the 1500 miles figure? If so, please identify the witness and specify the location where the number is used.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.



Emmett Rand Costich
Attorney

Washington, D.C. 20268-0001
July 31, 1998